

EXHIBIT 38

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re: AUTOMOTIVE PARTS ANTITRUST LITIGATION,	Master File No. 12-md-02311 Hon. Marianne O. Battani
In Re: ALL CASES	
THIS DOCUMENT RELATES TO: All Actions	

DECLARATION OF JUSTINA K. SESSIONS

I Justina K. Sessions declare under penalty of perjury as follows.

1. I am an attorney licensed to practice law in the State of California and am an associate with the law firm of Kecker & Van Nest LLP, located at 633 Battery Street, San Francisco, California 94111, counsel for Honda with respect to the subpoenas served in the above-referenced action (the "Subpoenas"). I have knowledge of the facts set forth herein, and if called to testify as a witness thereto, I could do so competently under oath.

2. On January 29, 2016, Honda made a document production in response to the Subpoenas. This production included wire harness purchase data and pricing

information (including complete MSRP and dealer-invoice price schedules for every vehicle manufactured in the United States during the time period covered by the Subpoenas) responsive to various requests in the Subpoenas. We made this production electronically; counsel for the serving parties could download it from an email link.

3. Two weeks after Honda made this production, I received an email from Ronnie Spiegel at Hagens Berman asking us to refresh the download link. Ms. Spiegel stated that “[a] number of parties did not download the production before the link expired and are now seeking access to the production.” A copy of that email is attached as Exhibit A.

I declare the foregoing under penalty of perjury under the laws of the state of Michigan. Executed this 16th day of February, 2016 at San Francisco, California.

By: _____
JUSTINA K. SESSIONS

EXHIBIT A

Justina K. Sessions

From: Ronnie Spiegel <ronnie@hbsslaw.com>
Sent: Friday, February 12, 2016 2:40 PM
To: Christine Ostergard; Jeniphr Breckenridge
Cc: Justina K. Sessions; Jordan C. Van Druff
Subject: RE: Auto Parts MDL Subpoena - Honda Document Production

Hi Christine and Justina,
I am hoping that you can refresh the link to the Honda production. A number of the parties did not download the production before the link expired and now are seeking to access the production.
Thank you for your help,
Ronnie

Ronnie Spiegel | **Hagens Berman Sobol Shapiro LLP** | Direct: (206) 268-9343

From: Christine Ostergard [mailto:costergard@kvn.com]
Sent: Friday, January 29, 2016 6:55 PM
To: Ronnie Spiegel; Jeniphr Breckenridge
Cc: jsessions@kvn.com; jvandruff@kvn.com
Subject: Auto Parts MDL Subpoena - Honda Document Production

Please find link to production volume MDLHONDA001.

Let us know A.S.A.P. if you have any problems downloading the file.

Thanks
Christine

Christine Ostergard
Senior Practice Support Analyst
415 676 2256 costergard@kvn.com
633 Battery Street, San Francisco, CA 94111-1809 | 415 391 5400

Files attached to this message

Filename	Size	Checksum (SHA1)
<u>MDLHONDA001.zip</u>	244 MB	92297395a49f74681757d38b0d53e58a23742457

Please click on the following link to download the attachments:
<https://sendfiles.kvn.com/message/17XclkKI0VTTM267igEtU2>

This email or download link can be forwarded to anyone.

The attachments are available until: **Friday, 5 February.**

Message ID: 17XclkKI

LiquidFiles Appliance: <https://sendfiles.kvn.com>